

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

CIVIL COMPLAINT NO:
1:22-CV-10905

RANDALL BOCK M.D.)
Plaintiff,)
v.)
CANDACE LAPIDUS SLOANE)
and GEORGE ABRAHAM, both solely in)
their individual capacities,)
Defendants.)

JURY DEMANDED

PLAINTIFF'S MOTION TO DISQUALIFY DEFENSE COUNSEL ERNST

On February 8, 2023, defendants acquired the services of yet another private corporate attorney from WilmerHale, and again, suspiciously at public expense. Benjamin N. Ernst (BBO #693849), with a history of patent law litigation, has filed a notice of appearance in this antitrust case that is proceeding, over plaintiff's objection, before Judge Gorton.

Attorney Ernst has previously interned for Judge Gorton.

The prejudice against plaintiff is immediately evident and extreme. This intentional prejudice is on top of corporate attorneys from WilmerHale defending Sloane and Abraham for free, while plaintiff has to prosecute his claim *pro se* because Sloane and Abraham ground him to dust economically.

Plaintiff also renews his *per se* objection to the corruption involved in WilmerHale attorneys acting as Special Assistant Attorneys General given that it remains unknown what benefit accrues to WilmerHale from this improper "Lend-Lease" arrangement.

It is immediately unacceptable that Attorney Ernst be allowed to appear in this case before Judge Gorton. A judge shall avoid situations that would create in reasonable minds even a "perception of impropriety." Because of the "uniqueness and value" of "the extraordinarily close relationship that exists between judge and law clerk", "the Court has an institutional duty to the

Motion denied. S/M Gorton, USDJ 03/02/2023